



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
St. Paul Regional Water Services, Maplewood, Minnesota

FROM: Charles Hall, Environmental Engineer
AECAB (MN-OH)

THRU: Brian Dickens, Section Chief
AECAB (MN-OH)

TO: File, St. Paul Regional Water Services, Maplewood, Minnesota

BASIC INFORMATION

Facility Name: St. Paul Regional Water Services

Facility Location: 1900 Rice Street, Maplewood, Minnesota

Date of Inspection: December 5, 2022

EPA Inspectors:

1. Charles Hall, U.S. EPA, Region 5, ECAD, AECAB, MN-OH Section

Other Attendees:

1. Bruce Berg, Safety Manager
2. Cheifei Chen, Production Director
3. Steve Evanson, Production Supervisor
4. Hayley Heidelberg, Emergency Planning and Security Supervisor
5. Corey Horvath, Chemical Feed System Repair
6. Andrew Magdziarz, Chemical Feed System Repair
7. Justine Roe, Water Quality Supervisor
8. Paul Scott, Production Supervisor
9. Luke Trosser, Production Supervisor

Contact Email Address: hayley.heidelberg@ci.stpaul.mn.us

Purpose of Inspection: CAA 112(r) inspection

Facility Type: municipal water supply

Regulations Central to Inspection: 40 C.F.R. Part 68

Arrival Time: 1310 hrs CDT

Departure Time: 1530 hrs CDT

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (sent by e-mail on 12/09/2022)
- ☐ Small Business Resource Information Sheet not provided because St. Paul Regional Water Services (SPRWS) is not a Small Business.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from the facility representatives.

Company Ownership: The ownership of the facility has not changed in the last 5 years.

Process Description: SPRWS operates a conventional surface water treatment plant, utilizing softening, clarification, filtration and disinfection to produce an average of just under 50 million gallons per day for its 446,721 customers. SPRWS uses chlorine and ammonia as a disinfectant.

Staff Interview: The staff interview used the RMP Program Level 3 Process Checklist as an outline for the staff interview.

TOUR INFORMATION

EPA Tour of the Facility: Yes.

Data Collected and Observations: The RMP Program Level 3 Process Checklist (Appendix B) summarizes the observations of whether SPRWS has the required documents in its Risk Management Plan.

Photos were taken during the inspection.

Field Measurements were not taken during the inspection.

RECORDS REVIEW

Before the inspection, the inspector requested the following documents:

1. Management structure in terms of RMP and who has responsibility for the different program elements and how that is documented;
2. Off-site Consequence Analysis supporting documentation;

3. Process Safety Information;
4. Process Hazard Analysis;
5. Operating Procedures specific to the covered process;
6. Lockout/Tagout procedures;
7. Training documentation on employees who operate and maintain the covered process;
8. Mechanical Integrity program procedures;
9. Management of Change written procedures;
10. Pre-Startup Safety Reviews completed in the covered process areas;
11. Compliance Audits, the two most recent audits, audit reports, findings of the audits, and how these findings have been resolved or corrected. (if applicable);
12. Incident Investigations performed for each of the covered processes, reports from the investigations, documentation on how the report findings and recommendations were addressed and resolved;
13. Employee participation plan of action regarding the implementation of the employee participation;
14. Hot work permit program/policy, examples of active permits issued for the processes;
15. Contractor policy, a list of contractors who have worked on or near the covered processes within the past two years, documentation on the safety performance and programs evaluated when selecting a contractor, work practices that control the entrance/exit or presence of contractors, documentation on how applicable provisions of the emergency response program are explained to contractors; and
16. Emergency Response Plan or Emergency Action Plan.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents: The inspector did not request additional documents.

Compliance Assistance: The inspector did not provide compliance assistance.

Concerns: The inspector identified one deficiency during the inspection and one after the inspection. During the inspection, SPRWS acknowledged that it had not conducted an annual emergency response coordination exercise in 2022. SPRWS did not update the emergency contact information in the RMP within 30 days of a change.

DIGITAL SIGNATURES

Report Author:

Section Chief:

APPENDICES AND ATTACHMENTS

A. Digital Image Log

B. RMP Program 3 Checklist

Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

APPENDIX A: DIGITAL IMAGE LOG

Photographer: Charles Hall Camera: Olympus Tough TG-6 EPA Bar Code: SZ4061

Image Number	File Name	Date and Time	Description of Image
1	PC050050	12/05/2022 14:43 hrs	Chlorine rail tank car bay



Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
2	PC050051	12/05/2022 14:46 hrs	Chlorine evaporators



Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
3	PC050052	12/05/2022 14:52 hrs	Chlorinators




Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
4	PC050053	12/05/2022 14:54 hrs	Chlorine injectors



Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
5	PC050054	12/05/2022 14:57 hrs	South ammonia bullet



Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
6	PC050055	12/05/2022 14:59 hrs	North ammonia and sensor



Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

Image Number	File Name	Date and Time	Description of Image
7	PC050056	12/05/2022 15:01 hrs	Ammonia evaporators
			
8	PC050057	12/05/2022 15:03 hrs	Ammonianators
			

Facility Name: Company
Facility Location: address, city, state
Date of Inspection:

APPENDIX B: RMP PROGRAM 3 CHECKLIST